

June 15, 2009

TO: Michael Hanbey, Attorney at Law

FROM: Teresa Parsons, SPHR  
Director's Review Program Supervisor

SUBJECT: Ron Allotta v. Department of Information Services  
Allocation Review Request ALLO-07-081

On April 15, 2009, I conducted a Director's review conference at the Department of Information Services, Forum Building, 605 East 11<sup>th</sup> Avenue, Olympia, Washington, concerning the allocation of Mr. Allotta's position. You and Mr. Allotta were both present at the Director's review conference. Alicia Ozanich, Assistant Attorney General (AAG), and Starleen Parsons, Human Resource Manager, represented the Department of Information Services (DIS). In addition, the following individuals from DIS also participated in the conference: Roland Rivera, Assistant Director for Telecommunication Services Division (TSD); Mike Lilly, Telecom Operations Manager; and Ron Kappes, State Enterprise Architect (SEA) with TSD.

### **Director's Determination**

This position review was based on the work performed for at least the six-month period prior to April 26, 2007. As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of Mr. Allotta's assigned duties and responsibilities, I conclude his position is properly allocated to the Information Technology Specialist 5 classification.

### **Background**

On April 26, 2007, Mr. Allotta completed a Position Review Request (PRR) asking that his position be reallocated from an Information Technology Specialist 5 (ITS 5) to the Information Technology Applications/Systems Specialist 6 (ITS/AS 6) classification. Mr. Allotta's supervisor at the time, Telecom Project Support Manager Kathy Hernandez-Bell and TSD Assistant Director Roland Rivera also signed the PRR on April 26, 2007 (Exhibit A-2). A Classification Questionnaire (CQ) for Ron Allotta's (Raedon Gelderman's) position (#5305) had been signed in June/July 2003 by him and his supervisor at that time, Michael

Partlow, (Exhibit R-3). At that time, Mr. Partlow had disagreed with Mr. Allotta's characterization of his duties and attached a statement and essential functions chart (Exhibit R-4).

On August 16, 2007, Human Resource Consultant Leah Maurseth and Human Resource Manager Starleen Parsons met with Mr. Allotta to review his job duties. They also met with Ms. Hernandez-Bell and TSD Management, as well as State Enterprise Architect (SEA) Ron Kappes. Mr. Allotta worked with Mr. Kappes on the Next Generation Network (NGN), a major project during the time relevant to this review. Mr. Kappes is a network architect who also serves as a project manager. At the time of this review, Mr. Kappes's position had been an ITS/AS 6. In approximately August 2007, after this review period, the SEA positions were put into a new classification specific to DIS (State Enterprise Architect). On August 29, 2007, Ms. Maurseth and Ms. Parsons met with Mr. Allotta and informed him that his position was appropriately allocated to the ITS 5 classification. On September 19, 2007, Ms. Parsons issued a letter affirming DIS's allocation determination.

On August 30, 2007, Mr. Allotta requested a Director's review of DIS's allocation determination.

### **Summary of Mr. Allotta's Perspective**

Mr. Allotta contends his position is the only position in his section assigned to work at a high capacity level, which involves managing the statewide infrastructure for high capacity bandwidth, primarily at the optical level. Mr. Allotta asserts the Position Review Request containing the signatures of his supervisor at the time, Ms. Hernandez-Bell, and Mr. Rivera confers written designation as the highest level WAN engineering authority for the evaluation, design, and implementation of the statewide high capacity network (Exhibit A-2). Mr. Allotta acknowledges the overall responsibility regarding the strategic plan for the network resides with the network architect position serving as the project manager; however, he asserts his position also has responsibility for the strategic plan by ensuring the network gets built and put into place. Mr. Allotta states that he may make recommendations or have discussions with the architect to refine the details of the design as needed. Mr. Allotta points out his history with the agency and notes that he formed the Provisioning Group and created the original documentation and details of the design creating the node sites. As a result, Mr. Allotta states that he understands the intricacies of the network and is responsible for ensuring that existing circuits from the previous network are reconstructed in the correct format to migrate to the new network. Mr. Allotta emphasizes that he is responsible for engineering the details of the plan from start to finish, and he believes the level of work assigned to his position fits the ITS/AS 6 classification.

### **Summary of DIS's Reasoning**

DIS acknowledges Mr. Allotta performs highly technical work at an expert level and that he performs his job very well. DIS also recognizes Mr. Allotta has been tasked with developing the details of the network design from start to finish. However, DIS contends Mr. Allotta has not been designated as the highest level authority for the technical and organizational

leadership of the statewide network. Instead, DIS states that level of authority resides with the network architect group along with the WAN Manager and TSD management. DIS notes that at the time relevant to this review, the network architect positions had been allocated to ITS/AS 6 positions. DIS acknowledges Mr. Rivera signed the Position Review Request but contends he was not performing an independent review of the duties and provided comments on Mr. Allotta's specific assignment of work when asked by HR (Exhibit R-7). DIS asserts the CQ for Mr. Allotta's position with his previous supervisor's response supports the level of responsibility assigned to his position (Exhibits R-3 & 4). DIS agrees Mr. Allotta's position has been assigned the responsibility for providing detailed design implementation of the statewide network. However, DIS contends the concept originated from high level architecture designs developed by a team of architects and engineers from DIS, private consultants, and the University of Washington. DIS contends the ITS 5 is the appropriate classification for Mr. Allotta's position.

### **Rationale for Director's Determination**

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Both the Personnel Appeals Board and the Personnel Resources Board have held that because a current and accurate description of a position's duties and responsibilities is documented in an approved classification questionnaire, the classification questionnaire becomes the basis for allocation of a position. An allocation determination must be based on the overall duties and responsibilities as documented in the classification questionnaire. Lawrence v. Dept of Social and Health Services, PAB No. ALLO-99-0027 (2000). The Position Description Form (PDF) replaced the classification questionnaire.

### **Duties and Responsibilities**

In this case, there is a CQ on file for Mr. Allotta's position from 2003. Attached to the CQ are comments from his supervisor at the time, Mr. Partlow. In addition, the document prompting this request is a Position Review Request (PRR) completed by Mr. Allotta and signed by his supervisor at that time, Ms. Hernandez-Bell, as well as the Assistant Director for TSD, Mr. Rivera. Subsequent to signing the PRR, Mr. Rivera prepared a memo commenting on the description of Mr. Allotta's assigned duties and responsibilities. I weighed the description of duties and responsibilities in these documents with the comments presented during the Director's review conference.

In summary, the CQ and PRR documents and attachments describe Mr. Allotta's position as a high level technical expert in the Provisioning Group responsible for the implementation of multi-technology systems and backbone network in support of the State

Enterprise Architects. Mr. Allotta's position has been tasked with engineering the designs, applications, and solutions impacting the Wide Area Network and Campus Fiber Network, including circuit level components system wide. Mr. Allotta's position is responsible for creating and implementing the details of designs developed by a team of architects and engineers and involves integrating new and existing technology for the statewide network. It is undisputed that Mr. Allotta performs highly complex tasks at an expert level. The issue in dispute is whether or not Mr. Allotta's position has been designated as the highest level authority with respect to his work on the statewide network.

During the Director's review conference, Mr. Allotta explained that the Provisioning group functions at two levels. The high capacity level manages the state infrastructure for high capacity bandwidth. Within his group, he works strictly and solely at the high capacity level and may advise staff in Provisioning and Network Service Operations when questions arise about high capacity fiber optics. At the lower level, staff members provision the basic circuits, which can be described as low capacity circuits that run across the state and connect to the state infrastructure, referred to as the backbone. The NGN is a backbone network that connects node sites across the state and allows traffic to pass through the system for agencies across the state. The traffic may include state agencies, county, city, military, and higher education, including the University of Washington.

The NGN project was roughly a two year project that included the time relevant to this review period. Mr. Rivera pointed to the IT Service Request Lifecycle to illustrate how DIS handles service requirements for projects (Exhibit R-11). Mr. Rivera indicated that once the TSD receives a requested service, the network architect positions (ITS/AS 6 at the time, which later became SEA) determine the scope and requirements, which then develop into a quote to the customer. Mr. Rivera explained this strategic portion of a project is completed before assigning it to Mr. Allotta's position to develop the details of the design. The reason for this process is to ensure the customer has accepted the proposal before allotting time and investment into the details of the plan. Mr. Allotta stated that the highest technical level position within the state is the SEA. Mr. Allotta further agreed he does not perform the work of an SEA and that he was not involved in the development of the NGN network during the development stage of the project. Mr. Rivera emphasized Mr. Allotta has a highly technical position, and he performs expert level, specialized design. Mr. Rivera stated the organization is structured so positions like Mr. Allotta's can focus on the technical aspects of a project rather than interfacing with the customers.

Mr. Allotta elaborated on his role in the NGN project and illustrated his points by referring to the detailed designs he created (Exhibits A-18-24). Mr. Allotta explained that the conception for a project like the NGN network is formulated at the SEA level and likely includes discussions with executive management. Mr. Allotta stated that he became involved with the NGN project during the advanced planning stage after the WAN Manager and SEA had worked on the initial planning and made decisions about type of equipment, circuits, software, and location. At that point, Mr. Allotta indicated he served as the technical advisor, creating and explaining the details of his design to the WAN Manager and SEA. Mr. Allotta indicated that he primarily worked with Ron Kappes (at least 50% of the time) in a collaborative effort, making recommendations when necessary and discussing

issues to come up with a best fit solution. Mr. Allotta indicated he did not independently make changes to the plan without consulting with Mr. Kappes.

Once the NGN plan was identified and assigned to Mr. Allotta to engineer the details, he ensured existing circuits on the previous network (Legacy) were reconstructed in the right format to migrate to the new network. Mr. Allotta was tasked with migrating the data and creating and refining the details of the design, which included hundreds of documents outlining the infrastructure of the network to migrate from one system to another and put into service. Mr. Allotta's designs supported the installation and testing of the equipment, and most documents were viewed by Mr. Kappes ahead of time to start the plan for putting the equipment into service. Although Mr. Allotta was not in charge of the Operational Support System (OSS) database, he was in charge of the high capacity portion of the OSS inventory system. Mr. Allotta explained that the OSS database housed the data reflecting all circuits on the NGN network, including real time information from certain switches. Mr. Allotta migrated the data from the vendor who built the database and other data that had been populated over time from design information. Mr. Allotta tested, configured, and linked the information. If testing failed, he worked with the vendor to resolve technical issues and make recommendations to his manager. Mr. Allotta's supervisor, Ms. Hernandez-Bell, acted as the service manager in terms of dealing with the software vendors, installation, and testing.

### Class Specifications

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations. Mr. Allotta's position fits within the IT category concept, which broadly describes positions in one or more information technology disciplines. Some of the IT functions may overlap from class to class; however, the definition and distinguishing characteristics identify the distinctions between the classes. Although examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification.

The **Information Technology Applications/Systems Specialist 6** (class code 03286 later replaced by ITS/AS 6, class code 479N) **definition** reads as follows:

Serves as the highest level authority for an agency or in a major subdivision of DSHS in an information technology specialty area such as, but not limited to: operating system architecture, network architecture, applications development, applications support and enhancement, desktop/server operating systems, data architecture/administration, security architecture/administration, project management methodology or telephony systems architecture.

The **distinguishing characteristics** indicate the following:

This is the expert professional level where incumbents are designated in writing by IT/IS management to provide technical and organizational leadership in a

specialized area of technology. Incumbents possess advanced technical as well as business knowledge and grasp the overall impact of their specialty such that they are trusted by management to independently deal with high risk, high profile initiatives that may impact significant/fundamental public services. Incumbents have mastered the ability to translate technological options into business terms and interact with executive management to create technology solutions to mission critical business problems. Incumbents in this class serve as the agency spokesperson in their area of technical expertise and may make commitments on behalf of their agency. Serve as a technical mentor, coach and trainer to others. Often supervises others.

**ITS/AS 6** incumbents typically perform the level of work described below a majority of the time. The work described below is not intended to be all inclusive but representative of the level of duties/responsibilities carried out by this job class:

- Responsible for an agency's strategic planning and policy development in their designated area of specialty;
- Plans, analyzes, and leads strategic business initiatives and legislative mandates in their designated area of specialty;
- Develops agency-wide information technology system architecture; develops multi-agency system architecture;
- Project leader for integrating new technologies with existing technologies;
- Work group leader for design of applications that have significant statewide impact (e.g. the payroll system) or multi-agency impact;
- Develops and implements standards and procedures for data, data modeling, and data architecture;
- Defines requirements for data base management system and support software; develops plan and coordinates agency-wide implementation of new data base management system software;
- Serves as management advisor and technical consultant to enhance and maintain on-going operation of all applications (mainframe, client/server, web, microcomputer, etc.) within assigned area of responsibility;
- Develops business plans, decision packages, and acquisition strategy for Department of Information Services review;
- Markets and sells services and products offered;
- Negotiates service level agreements for major, mission critical applications or services;

- Establishes security policies and standards at an agency or statewide (inter-agency) level; manages agency security plan; defines off-site disaster recovery back-up requirements for user databases and system files;
- Directs complex, multi-agency system hardware/software installation projects;
- Consultant to executive management in their designated area of specialty.
- Examples of assignments which correlate with this level of work include:
  - agency computing systems architect
  - chief data architect
  - chief data base architect/administrator
  - chief network architect
  - chief applications architect
  - web-based applications chief
  - agency security architect/administrator

A key distinction at the ITS/AS 6 level is designation as the highest level authority. While I understand Mr. Allotta indicated he serves as the highest level authority on the PRR signed by Mr. Rivera and Ms. Hernandez-Bell, Mr. Rivera clarified the delineation of responsibilities in a subsequent memo. In the memo, Mr. Rivera explained that Mr. Allotta's assignment of work at the time of this review was to provide a detailed design for implementing the high level architecture design already developed by a team of architects and engineers. During the Director's review conference, Mr. Allotta affirmed this when he explained that Mr. Kappes and the SEA group partnered with executive management and the University of Washington engineers, as well as private consultants to develop the conceptual plan for the NGN project. Mr. Kappes also explained that his role shifted from strategic design into project management as he (Mr. Kappes) was responsible for the business plan, including scope, schedule, and budget, and that he was accountable to Mr. Rivera as the project sponsor. Mr. Allotta also affirmed that he discussed the numerous design documents and details of the plan with Mr. Kappes as needed; however, he did not make any changes to the plan independent of working with Mr. Kappes. The comments from all parties during the Director's review conference support DIS's stance that Mr. Allotta had not been assigned the highest level of authority, including the strategic, conceptual part of the design for the statewide network. Therefore, the ITS/AS 6 class is not the appropriate fit.

The **Information Technology Specialist 5** (class code 479M) **definition** reads as follows:

This is the supervisory or expert level. Provides expert consultation and specialized analysis, design, development, acquisition, installation, maintenance, programming, testing, quality assurance, troubleshooting, and/or problem resolution tasks for major organization-wide, high risk/high impact, or mission-critical applications computing and/or telecommunication systems, projects, databases or database management systems; support products, or operational problems.

Performs highly-complex tasks such as conducting capacity planning to determine organization-wide needs and make recommendations; designing complex agency- or institution-wide enterprise systems crossing multiple networks, platforms or telecommunication environments; overseeing the daily operations of large-scale or enterprise systems; identifying and resolving operational problems for major high risk systems with centralized, organization-wide functions; testing multi-dimensional applications, providing quality assurance; developing standards or enhancing existing, high risk and impact, mission critical applications; integrating business solutions, or writing feasibility studies and decision packages for high visibility/impact initiatives.

Provides leadership and expert consultation for large-scale projects or enterprise systems that often integrate new technology and/or carry out organization-wide information technology functions, or impact other institutions or agencies. Provides project management leadership, technical expertise and demonstrates knowledge of project management practices, principles, and skills.

May supervise information technology specialists or function as a recognized expert who is sought out by others in resolving or assessing controversial or precedent-setting issues.

Though not exact, some **ITS 5 Typical Work** examples similar to the level and scope of responsibly assigned to Mr. Allotta's position include the following:

- Conducts capacity planning to determine organization-wide needs;
- Develops and implements project plans and designs complex agency- or institution-level, enterprise systems;
- Supports, maintains, and enhances existing, high risk and impact, mission critical applications. Analyzes and resolves very complex problems.
- Supports, maintains, and enhances database management system, and may install vendor and support software. (As it relates to work with OSS and responsibility for high capacity portion of inventory system).
- Directs quality assurance efforts. Develops and issues standards and processes including reporting, testing, and evaluation;
- Strategy implementation (In this case, implements the details of the strategic design and makes recommendations).
- Plans, analyzes, and develops requirements for application development and enhancement. Develops alternative solutions and makes recommendations.



- Leads problem solving teams in large operation. Evaluates problem-solving methodologies and facilitates adoption of a methodology.

Positions allocated to the ITS 5 class perform highly complex tasks at an expert level. They also provide expert level consultation and specialized design for major, high risk and critical impact systems. It is undisputed that Mr. Allotta performs highly complex technical duties when he creates and implements the specific details and designs for high level projects like the NGN. However, the highest level of responsibility at the time of this review resided with the network architect positions, in this case Mr. Kappes. Mr. Allotta's work implementing the details of the design fits within the highest level of duties and responsibilities described by the ITS 5 class.

As part of exhibit packet, Mr. Allotta submitted several Position Descriptions of ITS/AS 6 positions at DIS. I reviewed the Position Descriptions to gain a greater understanding of the organizational structure within DIS and TSD. During the Director's review conference, Mr. Rivera provided additional insight by indicating the majority of ITS/AS 6 positions within TSD had been in a supervisory role or in a role involving customer engagements, meaning interfacing with customers at the front end to finalize and complete requirements.

The former Personnel Appeals Board (PAB) and the Personnel Resources Board (PRB) have provided the following guidance:

While a comparison of one position to another similar position may be useful in gaining a better understanding of the duties performed by and the level of responsibility assigned to an incumbent, allocation of a position must be based on the overall duties and responsibilities assigned to an individual position compared to the existing classifications. The allocation or misallocation of a similar position is not a determining factor in the appropriate allocation of a position. Byrnes v. Dept's of Personnel and Corrections, PRB No. R-ALLO-06-005 (2006), citing Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

Most positions within the civil service system occasionally perform duties that appear in more than one classification. However, when determining the appropriate classification for a specific position, the duties and responsibilities of that position must be considered in their entirety and the position must be allocated to the classification that provides the best fit overall for the majority of the position's duties and responsibilities. See Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

There is no doubt Mr. Allotta had a critical role in developing the NGN and creating the intricate details of the design to integrate new and existing technologies for the statewide network. It is also clear that Mr. Allotta performs quality work and is highly valued and trusted by DIS management. A position's allocation does not diminish the quality of work performed and is not a reflection of performance or an individual's ability to perform higher-level work. Rather, an allocation is based on the majority of work assigned to a position.

Based on the overall duties, level of responsibility, and scope of assignments, the ITS 5 classification is the best fit for Mr. Allotta's position (#5305).

**Appeal Rights**

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board . . . . Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

**Please note the following changes:**

June 26 through July 3 the offices of the Director's Review Program and Personnel Resources Board Appeals Program will be moving to the Department of Personnel building located at 600 South Franklin in Olympia. Starting June 26, 2009, the main phone number for the two programs will be **360-664-0388** and all requests for Director's Reviews and appeals to the Personnel Resources Board must be filed:

**In person at:**

**600 South Franklin  
Olympia, WA 98504-7530**

**OR**

**By mail at: (unchanged)**

**Mail Stop 40911  
Olympia, WA 98504-0911**

The fax number remains the same - **360-753-0139**.

If no further action is taken, the Director's determination becomes final.

c: Ron Allotta  
Alicia Ozanich, AAG  
Starleen Parsons, DIS  
Lisa Skriletz, DOP

Enclosure: List of Exhibits

List of Exhibits

**A.** Filed by Ron Allotta August 30, 2007

1. Request for Director's Review form
2. Position Review Request form (signed and dated by supervisor)
3. Classification Specs Information Technology Specialist 5 (479M)
4. Classification Specs Information Technology Systems/AS 6 (479N)

**A-A.** Classification Specs Information Technology Applications/Systems Specialist 6 (0326)  
– (in effect at time of request)

**B.** DIS Allocation Determination Letter dated September 19, 2007.

**C.** Filed by Michael Hanbey on November 5, 2007 Letter of Representation.

**D.** Letter from Teresa Parsons, Director's Review Program dated November 30, 2007 to Mr. Hanbey regarding the protection of some documents to be used as exhibits and requesting a list of exhibits from Mr. Allotta.

**E.** January 18, 2008 letter from Michael Hanbey, attorney with Ron Allotta List of Exhibits attached.

**F.** Letter of Representation Filed by Alicia Ozanich, AAG on January 3, 2008 with February 27, 2008 letter stating availability.

**G.** April 14, 2008 letter from Alicia Ozanich with Protective Order, and list of employee exhibits protected.

**H.** July 10, 2008 letter from Mr. Hanbey re: Request for Documents for Review Hearing, requesting Ms. Parsons to address the difficulty in obtaining requested documents from DIS.

**I.** July 11, 2008 letter from Alicia Ozanich, AAG responding to Mr. Hanbey, notifying him that the documents in question will be submitted to him by the July 18, 2008 deadline.

<p><b>J.</b> July 15, 2008 Cover letter filed by Alicia Ozanich, AAG for Binder of Exhibits: <b>SEE ATTACHED LISTS FOR PARTIES EXHIBITS</b></p>
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**K.** July 31, 2008 Letter from Alicia Ozanich, AAG to Mr. Hanbey arranging employee exhibit review at DIS.

**L.** August 4, 2008 emails from/to Teresa Parsons, Mr. Hanbey and Ms. Ozanich concerning employee exhibits.

- M.** September 5, 2008 letter from Mr. Hanbey to Teresa Parsons with exhibit list and written summary of explanation of what each document illustrates attached.
- N.** September 24, 2008 letter from Teresa Parsons requesting clarification of Mr. Hanbey's exhibit list and summaries.
- O.** September 24, 2008 letter from Teresa Parsons to both parties outlining DOP's procedure of handling protected exhibits.
- P.** November 5, 2008 letter from Mr. Hanbey questioning DOP's request for exhibit summaries.
- Q.** November 25, 2008 letter from Teresa Parsons answering Mr. Hanbey's letter and explaining why clarification is needed.
- R.** December 4, 2008 letter from Ms. Ozanich to Teresa Parsons requesting more time for reviewing employee's exhibits.
- S.** December 15, 2008 letter from Ms. Ozanich to Teresa Parsons suggesting substituting some of employee's exhibits with documents from the internet.
- T.** December 16, 2008 notice of two week unavailability from Ms. Ozanich.
- U.** April 8, 2009 cover letter from Ms. Ozanich for packet of revised employee exhibits, with employees's original exhibit list attached.
- V.** April 14, 2009 email from Teresa Parsons to parties, re:  
Exhibits R-12 and A-25 considered as argument from the parties.

**ALLOTTA, RON v. DEPARTMENT OF INFORMATION SERVICES (DIS)**  
**DIRECTOR'S REVIEW PROGRAM**  
**ALLOCATION REVIEW REQUEST: ALLO-07-081**  
**EXHIBIT INDEX**

<b><u>Exhibit No.</u></b>		<b><u>DESCRIPTION</u></b>
R-1		Declaration of Starleen Parsons
R-2		Declaration of Michael Martel
R-3		07/28/2003 Classification Questionnaire (CQ)
R-4		09/04/2003 Essential Functions Chart
R-5		Current ITS-5 Class Specification
R-6		Current ITS-6 Class Specification
R-7		08/27/2007 Memo Re: Ron Allotta's Position from Roland Rivera, Assistant Director, Telecommunications Services Division
R-8		07/01/2007 Organizational Chart
R-9		09/19/2007 Allocation Determination
R-10		Position Review Request
R-11		IT Service Request Lifecycle Chart
R-12		DIS response to A-25 – considered part of DIS argument

	<b><u>Exhibit No.</u></b>	<b><u>DESCRIPTION</u></b>
A-1 through A-15 Demonstrative Only-Not Allocating Criteria	A-1	Classification Questionnaire dated 03/20/01 for R. Vander Lugt
	A-2	Classification Questionnaire dated 09/26/00 for J. Durre
	A-3	WGS Position Description – HRMS Basis Team Supervisor – Nathan Sunderman
	A-4	Classification Questionnaire dated 06/02/03 for M. Creamer
	A-5	Classification Questionnaire dated 11/16/04 for B. Webb
	A-6	Classification Questionnaire dated 05/14/03 for D. Himeda
	A-7	Classification Questionnaire dated 03/21/03 for R. Kappes
	A-8	WGS Position Description – ITS/A6 – Supervisor – Benjamin Parriott
	A-9	Classification Questionnaire dated 10/20/05 for M. Morgan
	A-10	Classification Questionnaire dated 10/23/02 for P. Hubert
	A-11	WGS Position Description – z/OS System Programmer – Don Schwartz
	A-12	WGS Position Description – Mike Hauser
	A-13	WGS Position Description – Information Technology S/AS 6 – Jack Ramsdell, Jr.
	A-14	WGS Position Description – Linda Jo Deremy
	A-15	WGS Position Description – Info Tech S/A S 6 – John Howe
	A-16	Engineering Research: GPS Stratum Oscillator Requirements
	A-17	Engineering Research: High-Speed Cable and Connector Standards

		<b><u>Engineering Diagrams:</u></b>
A-18 through A-24 CONFIDENTIAL AND SUBJECT TO PROTECTIVE ORDER	A-18	NGN Updgrade Project: Migration Design (Exhibit A: 07/07 Examples of Work)
	A-19	Design Transition Circuits (Exhibit B: 07/07 Examples of Work)
	A-20	Evolution of Statewide Ring (Exhibit C: 07/07 Examples of Work)
	A-21	OC 192 Ring Documents (Exhibit D: 07/07 Examples of Work)
	A-22	Test & Acceptance Documentation (Exhibit E: 07/07 Examples of Work)
	A-23	Physical plant documentation (Exhibit F: 07/07 Examples of Work)
	A-24	DIS Statewide network pre and post NGN (Exhibit G: 07/07 Examples of Work)
	A-25	Comparison of duties to ITS/AS6 distinguishing characteristics – From Mr. Allotta (considered part of Mr. Allotta's argument)